

WILLKIE FARR & GALLAGHER LLP

BENEDICT Y. HUR (SBN: 224018)

bhur@willkie.com

SIMONA AGNOLUCCI (SBN: 246943)

sagnolucci@willkie.com

EDUARDO E. SANTACANA (SBN: 281668)

esantacana@willkie.com

ARGEMIRA FLÓREZ (SBN: 331153)

aflorez@willkie.com

HARRIS MATEEN (SBN: 335593)

hmateen@willkie.com

333 Bush Street, 34th Floor

San Francisco, CA 94104

Telephone: (415) 858-7400

Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, *et al.* individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DEFENDANT GOOGLE LLC'S
[PROPOSED] ORDER RE:
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED (DKT. 377)**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Action Filed: July 14, 2020

Trial Date: February 10, 2025

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should Be Sealed (Dkt. 377) and documents filed in connection with that motion.

Having considered the Administrative Motion, Google's Statement in Support of Plaintiffs' Administrative Motion, and the Declarations of David Monsees, the Court finds that the material identified in Google's Statement in Support should be sealed.

Because the underlying motions at issue are non-dispositive, the good cause standard for sealing applies to all three categories of information Google seeks to seal. *Kamakana v. Cty & Cnty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006). *First*, there is good cause to redact email addresses of Google employees, all of whom are not parties to this action, in order to protect their privacy interests. *See, e.g., E. & J. Gallo Winery v. Instituut Voor Landbouw-En Visserijonderzoek*, 2018 WL 4961606, at *2 (E.D. Cal. Oct. 12, 2018); *Ehret v. Uber Techs., Inc.*, 2015 WL 12977024, at *3 (N.D. Cal. Dec. 2, 2015). *Second*, there is good cause to redact portions of the internal codes and names in Exhibit 7 to the Mao Decl. (Dkt. 378-8), in order to protect Google's business interests. *Third*, there is good cause to seal the commercially sensitive, proprietary business information in Exhibits 7 & 8 to the Mao Decl. (Dkts. 378-8, 378-9), in order to protect Google's business interests. *See Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 598-99 (1978); *Palantir Techs. Inc. v. Abramowitz*, 2021 WL 1925459, at *2 (N.D. Cal. Mar. 5, 2021). Google has narrowly tailored the information to be sealed.

Accordingly, the Court orders that the following information should be sealed.

Document	Information to be Sealed	Page Citation
Exhibit 6 (378-7)	Email usernames (LDAPs)	Bates Stamped Pages Ending - 500, -501
Exhibit 7 (378-8)	<u>Internal dashboard name</u> : G*** Internal metric Internal code function	Page 10
Exhibit 8 (378-9)	Internal metrics	Pages 1, 3, 4

1 Google is ordered to file redacted versions of the above-identified materials within 14 days
2 of this Order.

3 **IT IS SO ORDERED.**

4
5 DATED: _____

6 _____
7 Honorable Richard Seeborg
8 United States District Judge
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28